

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_

**v.** : **DATE FILED** \_\_\_\_\_

<b>ABIMELEC ACEVEDO</b>	:	<b>VIOLATIONS:</b>
<b>ANGEL LOUIS MARTINEZ,</b>	:	<b>21 U.S.C. § 846</b>
<b>a/k/a "Chuckie,"</b>	:	<b>(conspiracy to possess with the intent</b>
<b>KELVIN J. TAVERAS-GARCIA</b>	:	<b>to distribute 5 kilograms or more of</b>
	:	<b>cocaine - 1 count)</b>
	:	<b>21 U.S.C. § 841(a)(1), (b)(1)(A)</b>
	:	<b>(possession with intent to distribute 5</b>
	:	<b>kilograms or more of cocaine - 1 count)</b>
	:	<b>18 U.S.C. § 2</b>
	:	<b>(aiding and abetting)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From on or about February 20, 2005 through on or about February 24, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ABIMELEC ACEVEDO,  
ANGEL LOUIS MARTINEZ,  
a/k/a "Chuckie," and  
KELVIN J. TAVERAS-GARCIA**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally possess with the intent to distribute 5 kilograms or more, that is, approximately 6065 grams, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

## **MANNER AND MEANS**

It was a part of the conspiracy that:

2. Defendants ABIMELEC ACEVEDO and ANGEL LOUIS MARTINEZ arranged for the purchase of six kilograms of cocaine from a source known to the grand jury, for the purpose of distributing that cocaine to others.

3. At the direction of ABIMELEC ACEVEDO and ANGEL LOUIS MARTINEZ, defendant KELVIN J. TAVERAS-GARCIA agreed to transport the cocaine purchased from the source known to the grand jury to a location agreed upon by ABIMELEC ACEVEDO and ANGEL LOUIS MARTINEZ.

## **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object(s), the following overt acts, among others, were committed in the Eastern District of Pennsylvania:

1. On or about February 20, 2005, defendants ABIMELEC ACEVEDO and ANGEL LOUIS MARTINEZ met with other individuals at a restaurant in Philadelphia and agreed to purchase the six kilograms of cocaine for \$22,000 per kilogram.

2. On or about February 24, 2005, defendants ABIMELEC ACEVEDO and ANGEL LOUIS MARTINEZ arranged for and took delivery of the six kilograms of cocaine from an individual known to the grand jury.

3. On or about February 24, 2005, at the direction of ABIMELEC ACEVEDO and ANGEL LOUIS MARTINEZ, defendant KELVIN J. TAVERAS-GARCIA attempted to transport the six kilograms of cocaine to a location agreed upon by ABIMELEC ACEVEDO and ANGEL LOUIS MARTINEZ.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 24, 2005, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**ABIMELEC ACEVEDO,  
ANGEL LOUIS MARTINEZ,  
a/k/a "Chuckie," and  
KELVIN J. TAVERAS-GARCIA**

knowingly and intentionally possessed with the intent to distribute, and aided and abetted the possession with intent to distribute of, 5 kilograms or more, that is, approximately 6065 grams, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A) and Title 18, United States Code, Section 2.

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN  
UNITED STATES ATTORNEY**